On October 24, 2012, the Court extended the deadlines for fact and expert discovery to December 31, 2012 and January 31, 2013, respectively. Dkt. No. 98. However, that Order does not expressly address the deadlines to exchange expert reports. Thus, under the Court's current schedule, the deadline to designate expert witnesses and serve opening expert reports appears to remain on November 30, 2012 (one month before the end of fact discovery) and the deadline to serve rebuttal reports appears to remain on December 14, 2012 (two weeks before the end of fact discovery).

28

## Case3:10-cv-00979-JSW Document101 Filed11/14/12 Page2 of 4

| 1                               | Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the parties, through their                   |  |
|---------------------------------|---|--|
| 2                               | undersigned counsel, hereby jointly recommend and stipulate that the Court issue an order         |  |
| 3                               | setting the deadline to designate expert witnesses and serve opening expert reports for January   |  |
| 4                               | 9, 2013 and the deadline to serve rebuttal reports for January 18, 2013. The parties do not       |  |
| 5                               | anticipate that this requested extension will affect any other deadlines in the schedule that the |  |
| 6                               | Court has set for this case.  |  |
| 7                               |   |  |
| 8                               | IT IS SO STIPULATED.  |  |
| 9                               |   |  |
| 10                              | Dated. November 14, 2012 By.  | /s/ Ryan Buschell                                  |
| 11                              |   | Ryan Buschell COVINGTON & BURLING LLP              |
| 12                              |   | Attorney for Plaintiff Reynaldo Ayala              |
| 13                              |   |  |
| 14                              | Dated: November 14, 2012 By:  | _/s/ Giam Nguyen                                   |
| 15                              |   | Giam Nguyen Deputy Attorney General                |
| 16                              |   | Attorney for Defendants Wagner, Schlosser,         |
| 17                              |   | Guthrie, and Faaita                                |
| 18                              |   |  |
| 19                              | Dated: November 14, 2012 By:  | /s/ Christian Green                                |
| 20                              |   | Christian B. Green Law Offices of Samuel G. Grader |
| 21                              |   | Attorney for Defendant Edmonds                     |
| 22                              |   |  |
| 23                              |   |  |
| 24                              |   |  |
| <ul><li>25</li><li>26</li></ul> |   |  |
| 27                              |   |  |
| 28                              |   |  |
| 20                              | <b>'</b>  |  |

JOINT STIPULATION AND <u>[PROPOSED]</u> ORDER EXTENDING DEADLINES FOR EXPERT REPORTS Case No.: C 10-0979 JSW (PR)

## [PROPOSED ORDER] PURSUANT TO STIPULATION, IT IS SO ORDERED. November 14 \_\_\_\_\_, 2012 Date: United States District Judge